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Attorneys for Defendant and Counter-Plaintiff  
 INDYZEN, INC. and Defendant PRAVEEN  
 NARRA KUMAR

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

PARKRIDGE LIMITED and MABEL MAK,  
  
 Plaintiffs,  
  
 vs.  
  
 INDYZEN, INC. and PRAVEEN NARRA  
 KUMAR,  
  
 Defendants.

Case No.: 4:16-cv-07387-JSW

*Hon. Jeffrey S. White*

**DEFENDANTS' AND  
 COUNTERCLAIMANT'S [PROPOSED]  
 CASE SCHEDULE**

INDYZEN, INC.,  
  
 Counter-Plaintiff,  
  
 vs.  
  
 PARKRIDGE LIMITED, BOON GLOBAL,  
 LIMITED, F8 VIETNAM COMPANY  
 LIMITED, CALIFORNIA FITNESS &  
 YOGA CENTERS COMPANY LIMITED,  
 and RANDY DOBSON.  
  
 Counter-Defendants.

On March 2, 2020, the Court issued an order denying plaintiffs and counter-defendants PARKRIDGE LIMITED and MABEL MAK (“Plaintiffs”) Motion to Vacate, Modify or Correct the Final Award and granting defendants and counter-claimants INDYZEN, INC. and PRAVEEN NARRA KUMAR (“Defendants”) Motion to Confirm the Final Award and Lift the Stay in this matter. The Court ordered the parties to propose a schedule by no later than March 20, 2020 for resolution of the remaining matters before the Court.

Pursuant to this Court’s Order, Defendants, by and through their counsel of record, respectfully submit this Proposed Case Schedule:

Event	Defendants’ Proposed Dates
Last day for parties to file their respective claims and/or counterclaims that were not subject to Arbitration	April 15, 2020
Deadline to exchange initial disclosures	April 30, 2020
Close of limited fact discovery, limited to pending claims and not as to claims resolved by the arbitrator	June 30, 2020
Last day to file dispositive motions (one per side in the entire case)	July 31, 2020
Hearing on Dispositive Motions	August 15, 2020
Mandatory Settlement Conference	September 30, 2020
Final Pretrial Conference	October 16, 2020
Bench Trial	November 2, 2020
Length of Trial	3-5 Days

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1 Defendants' position is that the Arbitration disposed of most if not all the issues between  
2 the parties. From Defendants' perspective, the only issues left to be decided are payments due  
3 to Indyzen and/or Narra under the Morfit Agreement. Defendants believe that most if not all the  
4 claims Plaintiffs will assert are subject to issue preclusion and therefore can be decided by  
5 dispositive motion without the need for discovery. Moreover, since the Arbitrator already found  
6 that the Morfit Agreement was a valid contract, Plaintiffs breached the contract, and that  
7 Defendants fully performed or were otherwise excused from performance, Defendants believe  
8 that any claims for payment due to Indyzen and/or Narra thereunder can be resolved by  
9 dispositive motion.

10 The parties engaged in extensive fact and expert discovery in the Arbitration proceeding,  
11 which is why Defendants propose limited discovery limited to pending claims and not as to  
12 claims resolved by the arbitrator.

13 The Morfit Agreement contains a jury waiver provision, so any trial in this matter would  
14 be a bench trial.

15 DATED: March 20, 2020

Respectfully Submitted,

BULLIVANT HOUSER BAILEY PC

18 By /s/ Keith Gillette

19 Keith Gillette

20 Matthew A. Trejo

21 Attorneys for Defendant and Counter-Plaintiff  
22 INDYZEN, INC. and Defendant PRAVEEN  
23 NARRA KUMAR  
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